

STATE OF NEW HAMPSHIRE

before the

PUBLIC UTILITIES COMMISSION

GRANITE STATE ELECTRIC COMPANY d/b/a NATIONAL GRID

DM 05-172 - Generic Investigation into Utility Poles

AFFIDAVIT OF DAVID C. WAY

David C. Way, being duly sworn, deposes and says as follows:

My name is David C. Way. My business address is 9 Lowell Road, Salem, New Hampshire. I am the Director of Customer Operations for the North & Granite Division. My duties include the supervision of overhead/underground/substation operations, field engineering, and operations planning for the North & Granite Division.

The responses to Staff's second set of data requests were prepared by me or were prepared at my direction and under my supervision. I affirm that the responses to Staff's second set of data requests are true and correct to the best of my knowledge, information and belief.

Further the Affiant Sayeth Not.

2/3/06
Date

David C. Way
David C. Way

Subscribed to and sworn before me this 3RD day of February, 2006.

Notary Public [Signature]

My Commission Expires 7-13-2012

Request 2-1

Request:

Verizon - If a third garage is called when the primary garage and secondary garage yields no takers, how long, on average, does the process of attempting to contact a response crew take?

Response:

Verizon only.

Prepared by or under the supervision of:

Request 2-2

Request:

Verizon - Is Verizon obligated to go through its call list at a primary or secondary garage if it is generally known that the particular garage has a very low response rate? If yes, is this required even if Verizon has confirmed that an emergency exists and a crew is required?

Response:

Verizon only.

Prepared by or under the supervision of:

Request 2-3

Request:

Verizon - Please provide the location of the second and third Verizon garages (called when the primary garage yields no response) for Verizon's maintenance areas in the capital and seacoast service areas. Please provide the residences (limited to name of town or municipality) of the technicians assigned to these second and third garages. Please provide the driving time between the residences of each of the technicians and the garages to which they are currently assigned.

Response:

Verizon only.

Request 2-4

Request:

Verizon – Verizon indicated, during the 1/17/06 tech session, that greater than 60% of all calls to its Emergency Response Center (ERC) originate from the electric company. Please indicate in what percent and from whom the remaining calls originate.

Response:

Verizon only.

Prepared by or under the supervision of:

Request 2-5

Request:

All - If notified by local officials (e.g., police, fire) of an emergency, do you immediately dispatch a crew/technician to the scene? If not, why not? How is the decision made (based on what information) to send appropriate personnel?

Response:

When notified by local officials of an emergency, National Grid dispatches a Supervisor, Troubleshooter or a Crew to the scene immediately. The decision to send personnel is based on information received from the notifying party and in many cases, direct conversations with local officials.

Request 2-6

Request:

All - Please identify any protocol or procedures used by the utility for notification of the emergency management personnel of a licensing municipal, including but not limited to fire or police personnel, or of the state, in the event of an emergency, that pertains to the utility poles in the rights of way.

Response:

In general, pole damage or emergency repairs can be handled without notifying licensees at the time of the emergency. In the event an emergency arises that requires notification, the personnel responding will notify the National Grid Service Center Representative who in turn will notify local officials. Notification to the state in the event of an emergency is made by the National Grid Service Center as prescribed by the Accident Notification Protocol issued by the Public Utilities Commission.

Request 2-7

Request:

All - Please identify in the protocol or procedures described in #2-6, above, the state and local departments and/or individuals to be notified, the timing for such notification during such an emergency and the sequence of departments or individuals notified.

Response:

The municipal Police or Fire departments will be notified as quickly as possible to advise them of a situation that requires immediate attention. The state department to be notified will be the NHPUC following the protocol set forth in the Accident Notification Protocol (see attachment).

Granite State Electric Company d/b/a National Grid
Docket No. DM 05-172
Responses to Staff's Second Set of Data Requests
Attachment to Response 2-7

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STATE OF NEW HAMPSHIRE



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Accident Notification Protocol Roster

Pursuant to PUC 402.01 (telephone) the following is a list of commission staff contacts to be used for accident notification. Accidents should be reported per the contact order. Once person-to-person contact has been made with one of the below listed individuals and required information is conveyed, or the procedure has been exhausted, notification is deemed complete.

<u>Contact Name</u>	<u>Work Phone</u>
Jody O'Marra	(603) 271-6554
Kate Bailey	(603) 271-2444
ChristiAne Mason	(603) 271-2435

If unable to reach any of the above, or in the event of an Emergency or Electrical Contact and direct contact with one of the individuals listed above cannot be made during normal business hours please press 0 (zero) to be transferred to our reception desk or call the Commission's general phone number listed below. Identify that you are required to make direct contact with a person in order to get the message to the proper person as soon as possible.

If unable to reach any of the above outside of normal Commission hours, call the Commission's general phone number listed below and leave a voice mail message with required information.

- Commission normal working hours are Monday through Friday, 8:00 AM to 4:30 PM (EST).
- Commission General Phone number is (603) 271-2431.

Request 2-8

Request:

All – State and municipal emergency personnel direct most of their calls, during pole emergencies, to the electric companies. How might the utilities ensure that emergency personnel contact the Verizon ERC, as well as the electric companies, during these emergencies?

Response:

Municipal emergency personnel should have contact information available to notify both Verizon and the appropriate electric company for emergencies that involve poles.

Request 2-9

Request:

All -- How do the electric companies, normally first on-scene to a pole emergency, feel about continuing to contact the Verizon ERC with the initial damage assessment if state and emergency personnel include Verizon as one of their initial contacts?

Response:

Although National Grid has no issue with the existing arrangement, we have no objection to state and emergency personnel notifying Verizon. We would continue to communicate with Verizon as appropriate, consistent with good utility practice.

Request 2-10

Request:

PSNH -- PSNH has a local agreement with Verizon in the Rochester/Somersworth area that allows them to set a pole in a Verizon maintenance area after PSNH has contacted Verizon and there is no response by Verizon within two hours. Please supply data that documents how often PSNH used this option in the last 18 months?

Response:

PSNH only.

Prepared by or under the supervision of:

Request 2-11

Request:

All – Would adherence to routines suggested in questions #2-8 & #2-9 eventually eliminate the need for local agreements?

Response:

We are not aware of any local agreements between National Grid and Verizon, beyond the IOP.

Request 2-12

Request:

Verizon - Please provide the definition of "immediate response" as used in Verizon's response to Staff 1-3. Please describe the steps that Verizon takes to verify whether its expectation of an "immediate response to all emergencies" is being met frequently, sometimes or not at all. Please provide any data in Verizon's possession to support this response. Please describe how Verizon's procedures, organizational design and contract provisions ensure this objective.

Response:

Verizon only.

Request 2-13

Request:

Verizon - Please confirm that in its response to Staff 1-4, Verizon's reference to the lack of provisions in the contract regarding "paid standby" means that Verizon has no field crews or emergency response personnel on paid standby during nights and emergencies.

Response:

Verizon only.

Prepared by or under the supervision of:

Request 2-14

Request:

Verizon - Please confirm that Verizon's response to Staff 1-5 means that Verizon has no supervisory or management personnel on standby during weeknights from 3:00 p.m. until 7:00 a.m., and on weekends. If this is not correct, please provide the number of such supervisory or management personnel.

Response:

Verizon only.

Prepared by or under the supervision of:

Request 2-15

Request:

Verizon - Where is the Verizon Emergency Response Center located?

Response:

Verizon only.

Prepared by or under the supervision of:

Request 2-16

Request:

Verizon - Does Verizon set a limit as to how far a technician may be expected to travel in order to respond to an emergency, before it will excuse that technician from responding and seek another?

Response:

Verizon only.

Prepared by or under the supervision of:

Request 2-17

Request:

Verizon - Are the supervisors referred to in Verizon's response to Staff 1-7 on standby?

Response:

Verizon only.

Prepared by or under the supervision of:

Request 2-18

Request:

Verizon - Other than maintaining an Emergency Response Center and implementing a storm preparedness plan as described in Verizon's response to Staff 1-8, please specify the steps Verizon takes to ensure that an adequate number of technicians are available to provide an "immediate response" to emergency calls.

Response:

Verizon only.

Prepared by or under the supervision of:

Request 2-19

Request:

Verizon - What is the company's response time objective for the time required from when an emergency call is received by the Emergency Response Center to when a crew, who is willing to respond, is notified of a duty call?

Response:

Verizon only.

Prepared by or under the supervision of:

Request 2-20

Request:

Verizon - Regarding Verizon's response to Staff 1-11, please describe Verizon's understanding of its obligations to respond to an emergency call in (a) an electric utility's maintenance area, and (b) Verizon's maintenance area.

Response:

Verizon only.

Prepared by or under the supervision of:

Request 2-21

Request:

Verizon – Verizon indicated, during the 1/17/06 tech session, that it has started tracking tech response time to emergencies. Please supply the data collected in the last 18 months.

Response:

Verizon only.

Prepared by or under the supervision of:

Request 2-22

Request:

All – Please provide the response times from Verizon garages in Greenland and Somersworth for the last six months? Please provide the number of times when Verizon was not available to respond and identify each event as accurately as possible.

Response:

We are not aware of Verizon responding to an emergency in the National Grid service territory from one of these garages.

Request 2-23

Request:

Verizon – Please supply information concerning the October 2005 pole emergency in Rochester where a Verizon line crew dispatched from Augusta, Maine assisted PSNH with a broken pole?

Response:

Verizon only.

Prepared by or under the supervision of:

Request 2-24

Request:

Verizon - How does Verizon inspect the poles that its technicians have not climbed?

Response:

Verizon only.

Prepared by or under the supervision of:

Request 2-25

Request:

Verizon - Regarding Verizon response 1-13, please explain how Verizon complies with NESC 214A4 if such records are not maintained in the normal course of business.

Response:

Verizon only.

Prepared by or under the supervision of:

Request 2-26

Request:

Verizon - Please provide the actual number of full time employees assigned to pole setting, transfer and removal activities during 2005, broken out by specific garage.

Response:

Verizon only.

Prepared by or under the supervision of:

Request 2-27

Request:

Verizon - Regarding Verizon's response to Staff 1-9, are all of these after-hours (3:00 p.m. to 7:00 a.m.) calls? Please clarify the timeframe that is measured in the provided 'arrival' times. i.e., what is the start time (time first call is received, time technician is dispatched, or other?), and what is the end time (arrival at the work center, arrival on the scene, or other?).

Response:

Verizon only.

Request 2-28

Request:

Verizon - Please provide copies of all written protocols used by Verizon to determine size and location of poles, including but not limited to, priority for installation and repair schedules.

Response:

Verizon only.

Prepared by or under the supervision of:

Request 2-29

Request:

Verizon – Does the ERC require call-backs from the technicians when they arrive on an emergency site? If not, what other means are used to document and track response times?

Response:

Verizon only.

Prepared by or under the supervision of:

Request 2-30

Request:

All - Please provide for the last six months all documentation associated with keeping cost work orders involving the replacement and/or repair of poles and conduits due to motor vehicle or construction accidents in New Hampshire. The documentation should include the work order and final billing invoice and clearly identify the incident location, date, crew hours and the charges for time and material. It is requested that the information be provided in chronological order as determined by the specific date of the event causing the damage.

Response:

See documentation attached. Many of the attached motor vehicle incidents have not been final billed at this time, and therefore final billing invoices are not included.

Request 2-31

Request:

Verizon - In response to Staff 1-7, Verizon responded that "The geography area assigned to a supervisor varies by geography and garage location. Generally, Verizon will utilize the primary garage or the nearest two garages to cover an emergency response." Please provide for year 2005 the number of incidents requiring the utilization of resources from other than the primary garage and provide specific detail in regards to incident location and the specific garages involved in the response, including the identification of the garage or garages that could not respond.

Response:

Verizon only.

Request 2-32

Request:

Verizon - In response to Staff 1-25, Verizon provided a chart reflecting the number of assigned digger and placer trucks located in New Hampshire as of December 2005. For year 2005 please provide the actual in service utilization of the New Hampshire fleet broken out by the digger truck and placer truck categories, stated as percent utilized versus theoretical availability. For clarity, the request is seeking the percentage of actual fleet utilization (total assigned capacity less equipment down time).

Response:

Verizon only.

Request 2-33

Request:

All - In 2005 what percentage of digger truck and placer truck down time was attributed to maintenance and or equipment breakdown versus technician shortage due to incidental absence, vacation, training, long-term disability or other personnel factors?

Response:

National Grid has several digger trucks available in the State of New Hampshire. If a truck is down for maintenance or out of service due to a breakdown, another truck is available for use. The percentage is very low.

Request 2-34

Request:

All - With respect to Staff question 1-19, please identify the steps that are taken to notify a licensing municipality of changes in the field that affect the terms or conditions of the license granted for that specific pole location, including, but not limited to the location of the pole itself.

Response:

Municipals are notified of changes in the field by submitting a new "petition for license" with the municipal. If the municipal accepts the petition they will grant a license for the pole in accordance with the pole attachment agreement.

Request 2-35

Request:

All - With respect to Staff question 1-37, please state the procedure used within the utility to respond to a notice of removal received from a municipality or the state pursuant to RSA 231:177 through 182 inclusive.

Response:

Typically, requests from local government to relocate facilities in the public-right-of-way go to the business services group. The Business Service representative will obtain the necessary information including plans showing the facilities in question and any proposed locations for the facilities. All of this information is turned over to the engineer who will follow the same process as described in the response to data requests NHPUC 1-32, 1-33 and 1-36. As part of the design process, the engineer will determine if the facilities can be moved to alternative locations and submit designs for internal and external approval. If the work affects other utilities, meetings will be held with the affected parties to discuss mutual concerns. All changes will be incorporated into the final designs.

When the state requests that facilities be relocated on state owned property the request typically goes to National Grid's Department of Transportation ("DOT") representative who will obtain the state plans and forward them to the district office of National Grid where the work is to be performed. The DOT representative will be the liaison between the district office and the state. Once an engineer is assigned the job, they will follow the same procedure as detailed in the response to data request NHPUC 1-32.

Request 2-36

Request:

All - With respect to Staff question 1-1, please identify whether, at any time covered by data requests in this proceeding, the Commission has ordered specific emergency response procedures to be implemented, and if so how the costs of such implementation are recovered.

Response:

National Grid is not aware of the Commission ordering specific emergency response procedures to be implemented.